

## EXHIBIT 432



## INVENTORY CONTROL - SUSPICIOUS ORDER POLICY

<b>Policy Number:</b> 30-010	<b>Version/Revision Number:</b> 003
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<b>Policy Owner:</b> GERXDC	<b>Department:</b> GERXDC Service Co.
<b>Reference(s):</b> GERXDC-PAP001-001	

### PURPOSE/OBJECTIVE:

To identify, investigate, record, and report suspicious pharmaceutical product orders

### SCOPE:

This policy applies to:

- All GERXDC TMs who have access to the GERXDC facility.

### POLICY:

- Identified individuals from Giant Eagle Sourcing, Pharmacy Compliance, and GERXDC Team Members (TMs) must review pharmacy customer orders and order trends on a regular and for - cause basis to identify suspicious drug orders
- Suspicious orders are blocked and reported to the appropriate regulatory authority within the specified time frame as required

### PROCEDURES:

#### Reporting suspicious prescription product orders

- Giant Eagle and GERXDC team members review customer orders and order history trends to identify suspicious drug orders
- Suspicious order criteria include, but are not limited to:
  - Purchases over a defined time period that exceed a pre-determined threshold
  - Orders of unusual quantities compared to a customer's order history
  - Unique pattern of orders that differs from similar customers
  - Orders received outside of the normal pharmacy customer ordering process
- Identified orders are investigated to determine if the order is suspicious or legitimate
- Legitimate orders are released for processing and delivery to the customer

- Suspicious orders are blocked and reported to the applicable regulatory authorities within the specified time frame as required
  - Board of Pharmacy and FDA within three (3) business days
  - DEA (if controlled substance) upon determination
- GERXDC prepares and communicates any history of suspicious orders to the GE Pharmacy team as requested.
- GERXDC retains the records of the investigation and outcome for six (6) years

**COMPLIANCE:**

Non-compliance with this policy will result in progressive discipline up to and including termination in compliance with Human Resource guidelines